

Mr. David L. Harrison
Shorewood Packaging Corporation of Indiana
620 South Belmont Avenue
Indianapolis, IN 46221-0069

Re: 097-11766
First Significant Revision to
FESOP 097-5450-00107

Dear Mr. Harrison:

Shorewood Packaging Corporation of Indiana was issued a FESOP permit on December 12, 1997 for Printing Operation. A letter requesting changes to this permit was received on December 10, 1999. Additional permit changes were requested on April 20, 2000. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changing the source name from Queens Group Indiana, Inc. to Shorewood Packaging Corporation of Indiana, deleting press H-3 from the permit, replacing press P-8 with press M-3, and changing in the VOC and HAP limits from a fixed monthly limit to a twelve (12) consecutive month period.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Patrick Coughlin, ERMD, 2700 South Belmont Avenue, Indianapolis Indiana 46221 or call at 327-2510.

Sincerely,

Ms. Mona A. Salem
Chief Operating Officer DPW

Attachments

cc: U.S. EPA, Region V
Mindy Hahn, IDEM OAM

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

**OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION**

**Shorewood Packaging Corporation of Indiana
620 South Belmont Avenue
Indianapolis, Indiana 46268**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-5450-00107	
Issued by: Dr. Robert Holm Administrator, ERMD	Issuance Date: December 11, 1996

First Significant Permit Modification 097-9370, issued March 6, 1998

First Significant Permit Revision: SMF097-11766	Pages Affected: 4, 27, 28, 29, 30, 31, 34, 35 33a&33b supercedes 33
Issued by: Ms. Mona A. Salem Chief Operating Officer DPW	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Indianapolis Environmental Resources Management Division (ERMD), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a Lithographic Printing Operation.

Responsible Official: Mr. Kenneth Reddick
Source Address: 620 S. Belmont Avenue, Indianapolis, Indiana 46268
Mailing Address: 620 S. Belmont Avenue, Indianapolis, Indiana 46268
SIC Code: 2731
County Location: Marion
County Status: Attainment for all criteria air pollutants
Source Status: Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The stationary source consists of the following emission units and pollution control devices:

- (1) Emission unit M-1 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S₁. The maximum operating capacity of this press is 14.57 million square inches per hour.
- (2) Emission unit M-2 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S₄. The maximum operating capacity of this press is 22.74 million square inches per hour.
- (3) Emission unit M-3 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to one stack identified as S₂. The maximum operating capacity of this press is 10.63 million square inches per hour.
- (4) Emission unit P-9 is a Planeta Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to one stack identified as S₃. The maximum operating capacity of this press is 16.16 million square inches per hour.
- (5) Emission unit PA-1 is the Pre-press area. This area is used for photographing, developing of film and preparation of plates for the printing operation.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas fired combustion source with heat input equal to or less than ten million (10,000,000) Btu per hour.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) Emission unit M-1 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S_1 . The maximum operating capacity of this press is 14.57 million square inches per hour.
- (2) Emission unit M-2 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S_4 . The maximum operating capacity of this press is 22.74 million square inches per hour.
- (3) Emission unit M-3 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to one stack identified as S_2 . The maximum operating capacity of this press is 10.63 million square inches per hour.
- (4) Emission unit P-9 is a Planeta Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to one stack identified as S_3 . The maximum operating capacity of this press is 16.16 million square inches per hour.
- (5) Emission unit PA-1 is the Pre-press area. This area is used for photographing, developing of film and preparation of plates for the printing operation.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound [326 IAC 8-4-1(1)] [326 IAC 8-1-6]

Pursuant to 326 IAC 8-4-1(1) the combined VOC emissions from emission units M-1, M-2, P-9, M-3 and PA-1 are limited 96.24 ton per twelve (12) consecutive month period such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) The VOC emissions from emission unit M-1 shall not equal or exceed 25 tons per twelve consecutive month period, rolled on a monthly basis, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (b) The VOC emissions from emission unit M-2 shall not equal or exceed 25 tons per twelve consecutive month period, rolled on a monthly basis, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (c) The VOC emissions from emission unit M-3 shall not equal or exceed 25 tons per twelve consecutive month period, rolled on a monthly basis, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (d) The VOC emissions from emission unit P-9 shall not equal or exceed 25 tons per twelve consecutive month period, rolled on a monthly basis, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.

D.1.3 Hazardous Air Pollutants [326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 2-8-4 the emissions of any single Hazardous Air Pollutant from emission units M-1, M-2, M-3, P-9, and PA-1 are limited to 9.0 tons per twelve month consecutive month period, rolled monthly, such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.
- (b) Pursuant to 326 IAC 2-8-4 the emissions of any combination of Hazardous Air Pollutants from emission units M-1, M-2, M-3, P-9 and PA-1 are limited to 23 tons per twelve month consecutive month period, rolled monthly, such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds and Hazardous Air Pollutants

Compliance with the VOC and HAP emissions limitations established in conditions D.1.1, D.1.2 and D.1.3 shall be demonstrated within 30 days of the end of each month based on the monthly VOC and HAP emissions calculations. The monthly VOC emissions shall be based on the monthly usage of VOC containing materials, percent weight of VOCs in materials used and shall assume a 95% VOC retention factor for inks used on the Non-heat Set Lithographic Presses. The monthly HAP emissions shall be based on the monthly usage of HAP containing materials and percent weight of HAPs in materials.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.5 Recordkeeping

- (a) To document compliance with condition D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be taken monthly. All records shall be complete and sufficient to establish compliance the VOC emission limits in condition D.1.1.
 - (1) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
 - (2) The VOC content (weight percent) of each material used;
 - (3) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable.
- (b) To document compliance with condition D.1.3 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be taken monthly. All records shall be complete and sufficient to establish compliance the HAP emission limits in condition D.1.3.
 - (1) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
 - (2) The HAP content (weight percent) of each material used;

- (3) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Quarterly Reporting

That a quarterly summary to document compliance with operation condition number D.1.1, D.1.2 and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-5450-00107

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-5450-00107

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the ERMD and OAM, within four **(4)** business hours; and
C The Permittee must submit notice in writing or by facsimile to ERMD and OAM within
two **(2)** days, and follow the other requirements of 326 IAC 2-8-12
- 9** 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)
C The Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT, COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
FESOP Quarterly Report**

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue Indianapolis , Indiana 46268
FESOP No.: F097-5450-00107
Facility: M-1, M-2, M-3, P-9 and PA-1
Parameter: VOC emissions
Limit: VOC emissions from emitting units M-1, M-2, M-3 and P-9 shall not exceed 25 tons of VOC per twelve consecutive month period per emitting unit.

Page 1 of 2

	1 st Month of the Quarter		
	VOC emissions this month	VOC emission for previous 11 months	VOC emission for twelve consecutive month period
M-1			
M-2			
M-3			
P-9			

	2 nd Month of the Quarter		
	VOC emissions this month	VOC emission for previous 11 months	VOC emission for twelve consecutive month period
M-1			
M-2			
M-3			
P-9			

	3 rd Month of the Quarter		
	VOC emissions this month	VOC emission for previous 11 months	VOC emission for twelve consecutive month period
M-1			
M-2			
M-3			
P-9			

Equation: VOC emissions (tons/month) =

$\left[\text{density (lbs/gal)} \times \text{wt.\% of VOC} \times \text{gal. solvents/month} \right] \times \left[\text{density of inks (lbs/gal)} \times \text{wt.\% VOC} \times \text{gal. of inks/month} \times (100\% - 95\%) \text{ retention factor} \right]$

Page 2 of 2

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
FESOP Quarterly Report**

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-5450-00107
Facility: M-1, M-2, M-3, P-9 and PA-1
Parameter: HAP emissions
Limit: 9.0 tons of an individual HAP per twelve consecutive month period , and 23 tons of any combination of HAPs per twelve consecutive month period .

Year: _____

Month	Highest Single HAP emissions for the twelve consecutive month period	Total Combined HAP emission This Month	Total Combined HAP emissions for the previous 11 month	Total Combined HAP emissions for the twelve consecutive month period
1 st Month of the Quarter				
2 nd Month of the Quarter				
3 rd Month of the Quarter				

Equation: HAP emissions (tons/month)

$$j \quad [\text{density (lbs/gal)} \times \text{wt.\% of HAP} \times \text{gal. solvents/month}]$$

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE REPORT**

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-5450-00107

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management
and
Indianapolis Environmental Resources Management Division**

Addendum to the
Technical Support Document for FESOP Significant Permit Revision

Source Name:	Shorewood Packaging Corporation of Indiana
Source Location:	620 South Belmont Avenue, Indpls., IN 46268
County:	Marion
SIC Code:	2731
Operating Permit No:	F097-5450-00107
Operating Permit Issuance Date:	December 11, 1996
Permit Revision No.:	SSM 097-11766-00107
Permit Reviewer:	Patrick Coughlin

On March 3, 2000, the Office of Air Management (OAM) and Environmental Resources Management Division had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Shorewood Packaging had applied for a Significant Permit Revision for a change from fixed monthly HAP and VOC limits to twelve month rolling sums. The notice also stated that OAM and ERMD proposed to issue a permit for this revision and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 20, 2000, Shorewood Corporation of Indiana submitted comments on the proposed permit revision. The summary of the comments is as follows:

Comment 1: Shorewood Packaging would like to replace press P-8, previously identified as a press which was to be removed from the permit, with press M-3. The new M-3 press would comply with the same applicable permit requirements as the P-8 press being replaced.

Response to Comment 1: Since the new M-3 press is replacing the P-8 press and the applicable permit requirements are the same for both presses, ERMD is incorporating this change as an administrative amendment pursuant to 326 IAC 2-8-10(14). As a result of this change the following changes were incorporated into this permit:

A. Condition A.2 Emission Units and Pollution Control Equipment Summary is being revised to reflect the replacement of press P-8 with M-3 as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The stationary source consists of the following emission units and pollution control devices:

- (1) Emission unit M-1 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S₁. The maximum operating capacity of this press is 14.57 million square inches per hour.
- (2) Emission unit M-2 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S₄. The maximum operating capacity of this press is 22.74 million square inches per hour.
- (3) Emission unit ~~M-3~~ ~~P-8~~ is a ~~Mitsubishi Planeta~~ Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to one stack identified as S₂. The maximum operating capacity of this press is **10.63** million square inches per hour.

- (4) Emission unit P-9 is a Planeta Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to one stack identified as S₃. The maximum operating capacity of this press is 16.16 million square inches per hour.
 - (5) Emission unit PA-1 is the Pre-press area. This area is used for photographing, developing of film and preparation of plates for the printing operation.
- B. Section D.1 Description is being revised as indicated above.
- C. Condition D.1.1 Volatile Organic Compounds is currently included in the Shorewood Packaging's existing permit. This condition was initially taken out of the public noticed version of this permit, since based on the elimination of presses H-3 and P-8 this condition was not needed. As a result of the requested change involving the replacement of press P-8 with the new M-3 press, it was necessary to bring this condition back to ensure compliance with the FESOP limit of less than 100 ton per year of VOCs. Therefore condition D.1.1 is being revised to reflect the replacement of press P-8 with press M-3 and the change from the fixed monthly limit of 8.02 tons to a twelve month rolling sum of 96.24 tons. The 96.24 tons per twelve consecutive month period was derived from multiplying the fixed monthly limit by twelve. Condition D.1.1 was revised to read as follows:

D.1.1 Volatile Organic Compound [326 IAC 8-4-1(1)] [326 IAC 8-1-6]

Pursuant to 326 IAC 8-4-1(1) the combined VOC emissions from emission units M-1, M-2, P-9, M-3 and PA-1 are limited 96.24 tons per twelve (12) consecutive month period such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

- D. Condition D.1.1 (now renumbered D.1.2) Volatile Organic Compounds was revised to reflect the replacement of press P-8 with press M-3. Condition D.1.2 was revised to read as follows:

D.1.4 2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The following emissions limitations shall not be construed to mean that the total VOC emissions can exceed the emission limitations stated in condition D.1.1.

- (a) The VOC emissions from emission unit M-1 shall not equal or exceed 25 tons per twelve consecutive month period, rolled on a monthly basis, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
 - (b) The VOC emissions from emission unit M-2 shall not equal or exceed 25 tons per twelve consecutive month period, rolled on a monthly basis, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
 - (c) **The VOC emissions from emission unit M-3 shall not equal or exceed 25 tons per twelve consecutive month period, rolled on a monthly basis, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.**
 - (de) The VOC emissions from emission unit P-9 shall not equal or exceed 25 tons per twelve consecutive month period, rolled on a monthly basis, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- E. Condition D.1.2 (now renumber D.1.3) Hazardous Air Pollutants Volatile Organic Compounds was revised to reflect the replacement of press P-8 with press M-3. Condition D.1.3 was revised to read as follows:

D.1.23 Hazardous Air Pollutants [326 IAC 8-4-1]

- (a) Pursuant to 326 IAC 8-4-1(1) the emissions of any single Hazardous Air Pollutant from emission units M-1, M-2, ~~P-8~~ **M-3**, P-9, and PA-1 are limited to 9 tons per twelve consecutive month period, rolled monthly, such that the Part 70 Operating Permit

Regulation 326 IAC 2-7 shall not apply.

- (b) Pursuant to 326 IAC 8-4-1(1) the emissions of any combination of Hazardous Air Pollutants from emission units M-1, M-2, ~~P-8~~ **M-3**, P-9, and PA-1 are limited to 23 tons per month twelve consecutive month period, rolled monthly, such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

- F. Condition D.1.3 (now renumber D.1.4) Volatile Organic Compounds and Hazardous Air Pollutants was revised to reflect the replacement of press P-8 with press M-3. Condition D.1.4 was revised to read as follows:

D.1.34 Volatile Organic Compounds and Hazardous Air Pollutants

Compliance with the VOC and HAP emissions limitations established in conditions D.1.1, ~~and D.1.2~~ **and D.1.3** shall be demonstrated within 30 days of the end of each month based on the monthly VOC and HAP emissions calculations. The monthly VOC emissions shall be based on the monthly usage of VOC containing materials, percent weight of VOCs in materials used and shall assume a 95% VOC retention factor for inks used on the Non-heat Set Lithographic Presses. The monthly HAP emissions shall be based on the monthly usage of HAP containing materials and percent weight of HAPs in materials.

- G. Condition D.1.4 (now renumber D.1.5) Recordkeeping was revised to reflect addition of condition D.1.1 back into the permit. Condition D.1.5 was revised to read as follows:

D.1.45 Recordkeeping

- (a) To document compliance with condition D.1.1 **and D.1.2** the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be taken monthly. All records shall be complete and sufficient to establish compliance the VOC emission limits in condition D.1.1.
 - (1) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
 - (2) The VOC content (weight percent) of each material used;
 - (3) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable.
- (b) To document compliance with condition D.1.23 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be taken monthly. All records shall be complete and sufficient to establish compliance the HAP emission limits in condition D.1.3.
 - (1) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
 - (2) The HAP content (weight percent) of each material used;
 - (3) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

- H. Condition D.1.5 (now renumber D.1.6) Quarterly Reporting was revised to reflect addition of condition D.1.1 back into the permit. Condition D.1.6 was revised to read as follows:

D.1.56 Quarterly Reporting

That a quarterly summary to document compliance with operation condition number D.1.1, D.1.2 and D.1.23 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

- I. Reporting form on page 33 of 35 was revised to reflect the replacement of press P-8 with press M-3.
- J. Reporting form on page 34 of 35 was revised to reflect the replacement of press P-8 with press M-3.

Comment 2: The name of the responsible official has changed from Mr. Richard Popp to Mr. Richard Harrison and the attainment status has been changed to attainment for all criteria air pollutants.

Response to Comment 2: Condition A.1 has been revised as requested. Condition A.2 has been revised to read as follows:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a Lithographic Printing Operation.

Responsible Official:	Mr. Kenneth Reddick Mr. Richard Popp
Source Address:	620 S. Belmont Avenue, Indianapolis, Indiana 46268
Mailing Address:	620 S. Belmont Avenue, Indianapolis, Indiana 46268
SIC Code:	2731
County Location:	Marion
County Status:	Attainment for all criteria air pollutants Nonattainment for Sulfur Dioxide, and Total Suspended Particulates
Source Status:	Minor Source, FESOP Program

**Indiana Department of Environmental Management
Office of Air Management
And
Indianapolis Environmental Resources Management Division
Air Quality Management Division**

**Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable Operating Permit (FESOP)**

Source Background and Description

Source Name:	Shorewood Packaging Corporation of Indiana
Source Location:	620 South Belmont Avenue, Indianapolis, Indiana 46221-0069
County:	Marion
SIC Code:	2752
Operating Permit No:	F097-5450-00107
Operating Permit Issuance Date:	December 11, 1996
Permit Revision No.:	SSM 097-11766-00107
Permit Reviewer:	Patrick Coughlin

The Office of Air Management (OAM) has reviewed a FESOP application from Shorewood Packaging Corporation of Indiana requesting the following revisions:

- a. The removal of presses P-8 and H-3 from section A.3 and D.1 of the permit.
- b. The removal of condition D.1.1 from the permit. This condition was used to limit the VOC emissions from all significant emitting units combined to less than 8.02 tons per month such that the Part 70 regulation shall not apply. This condition is no longer necessary since the limited potential to emit for the remaining units is 82 tons per year.
- c. Revision to conditions D.1.2 (renumber D.1.1) and D.1.3 (renumbered D.1.2) to reflect a compliance period of 12 consecutive months rolled on a monthly basis rather than a fixed monthly limit.
- d. Revision to conditions D.1.4 (renumber D.1.3) , D.1.5 (renumber D.1.4) and D.1.6 (renumber D.1.5) to reflect the new emissions limitations and the elimination of presses P-8 and H-3.

History

On December 10, 1999, Shorewood Packaging Corporation of Indiana (previously named Queens Group) submitted an application to the ERMD and OAM requesting a name change, the deletion of presses P-8 and H-3 and subsequent revision to conditions D.1.1, D.1.2 and D.1.3 in their existing Permit. Shorewood Packaging Corporation of Indiana was issued a FESOP on December 11, 1996. This FESOP was revised on March 3, 1998 to allow for the addition of a new press.

Enforcement Issue

There is no enforcement action pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A letter was received on December 10, 1999, requesting review under the revised 326 IAC 2 rules which were promulgated on December 25, 1998.

Justification for Modification

The FESOP is being modified through a FESOP Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11(d)(1), since this permit revision will result in significant changes to the existing permit conditions and will relax existing recordkeeping and reporting requirements. This source may implement the proposed changes once this permit revision is approved.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
M-1				25 ⁽¹⁾			9 tpy for Single HAP 23 tpy for Combined HAP
M-2				25 ⁽¹⁾			
P-9				25 ⁽¹⁾			
PA-1				4 ⁽²⁾			
Insignificant	3			3 ⁽²⁾			1 tpy for single HAP 2 tpy for Combined HAP
Total Emissions	3			82			10 tpy for single HAP 25 tpy for combined HAP

⁽¹⁾ The Potential to Emit VOCs are limited to less than 25 tons per twelve consecutive month period such that 326 IAC 8-1-6 shall not apply.

⁽²⁾ The values provided in the table reflect the potential emissions from these units based on maximum operating capacity and continuous hours of operation.

Federal Rule Applicability

There have been no new federally applicable requirements as a result of this modification

State Rule Applicability - Entire Source

There have been no new source wide applicable requirements as a result of this modification.

State Rule Applicability - Individual Facilities

Volatile Organic Compound [326 IAC 2-8-4] [326 IAC 8-1-6]

Condition D.1.1 limiting the VOC emissions from significant emission units to less than 8.02 tons per month was deleted from the permit. This condition was deleted since the total potential to emit from the three (3) remaining presses and prepress area is 82 tons per year which is less than the Part 70 applicability threshold of 100 tons per year of VOCs (see limited potential to emit table).

~~D.1.1 Volatile Organic Compound [326 IAC 8-4-1(1)] [326 IAC 8-1-6]~~

~~Pursuant to 326 IAC 8-4-1(1) the combined VOC emissions from emission units M-1, M-2, P-8, P-9, H-3, and PA-1 are limited 8.02 tons per months such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.~~

Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Condition D.1.2 (now renumbered D.1.1) limiting the VOC emissions from individual presses to less than 2 tons per month, such that 326 IAC 8-1-6 shall not apply, was revised. The VOC emissions are now limited to less than 25 tons per twelve consecutive month period, rolled on a monthly basis. Condition D.1.2 (renumbered D.1.1) was revised to read as follows (The stricken out language is being removed and the bolded language is being added);

~~D.1.21 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]~~

~~The following emissions limitations shall not be construed to mean that the total VOC emissions can exceed the emission limitations stated in condition D.1.1.~~

(a) The VOC emissions from emission unit M-1 shall not equal or exceed **25 tons per twelve consecutive month period, rolled on a monthly basis**, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.

(b) The VOC emissions from emission unit M-2 shall not equal or exceed **25 tons per twelve consecutive month period, rolled on a monthly basis**, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.

~~(c) The VOC emissions from emission unit P-8 shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.~~

(dc) The VOC emissions from emission unit P-9 shall not equal or exceed **25 tons per twelve consecutive month period, rolled on a monthly basis**, such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.

~~(e) The VOC emissions from emission unit H-3 shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.~~

Hazardous Air Pollutants [326 IAC 2-8-4]

Condition D.1.3 (now renumbered D.1.2) limiting the combined and individual HAP emission to less than 1.83 and 0.67 tons per month respectively was revised. The combined and individual HAP limits were revised to be 9 tons per twelve consecutive month period and 23 tons per twelve consecutive month period respectively. Condition D.1.3 (renumbered D.1.2) was revised to read as follows (The stricken out language is being removed and the bolded language is being added);

D.1.32 Hazardous Air Pollutants [326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 2-8-4 the emissions of any single Hazardous from emission units M-1, M-2, ~~P-8~~, P-9, ~~H-3~~, and PA-1 are limited to ~~0.67~~ **9.0** tons per **twelve consecutive month period, rolled monthly**, such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.
- (b) Pursuant to 326 IAC 2-8-4 the emissions of any combination of Hazardous Air Pollutants from emission units M-1, M-2, ~~P-8~~, P-9, ~~H-3~~, and PA-1 are limited to ~~4.83~~ **23** tons per **twelve consecutive month period, rolled monthly**, such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

Other Miscellaneous Changes to the permit

As a result of the aforementioned revisions the following changes were made to condition D.1.4, D.1.5 and D.1.6 (renumbered D.1.3, D.1.4 and D.1.6). Conditions D.1.4, D.1.5 and D.1.6 (renumbered D.1.3, D.1.4 and D.1.6) were revised to read as follows (The stricken out language is being removed and the bolded language is being added);

D.1.43 Volatile Organic Compounds and Hazardous Air Pollutants

Compliance with the VOC and HAP emissions limitations established in conditions D.1.1, ~~and D.1.2 and D.1.3~~ shall be **demonstrated within 30 days of the end of each month** based on the monthly VOC and HAP emissions calculations. The monthly VOC emissions shall be based on the monthly usage of VOC containing materials, percent weight of VOCs in materials used and shall assume a 95% VOC retention factor for inks used on the Non-heat Set Lithographic Presses. The monthly HAP emissions shall be based on the monthly usage of HAP containing materials and percent weight of HAPs in materials.

D.1.54 Recordkeeping

- (a) To document compliance with condition D.1.1 ~~and D.1.2~~ the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be taken monthly. All records shall be complete and sufficient to establish compliance the VOC emission limits in condition D.1.1 ~~and D.1.2~~.
 - (1) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
 - (2) The VOC content (weight percent) of each material used;
 - (3) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable.
- (b) To document compliance with condition D.1.32 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be taken monthly. All records shall be complete and sufficient to establish compliance the HAP emission limits in condition D.1.3.
 - (1) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
 - (2) The HAP content (weight percent) of each material used;
 - (3) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.65 Quarterly Reporting

That a quarterly summary to document compliance with operation condition number D.1.1, **and** D.1.2 ~~and D.1.3~~ shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

Compliance Requirements

There are no new compliance monitoring provisions added to this per as a result of this modification.

Conclusion

The operation of this printing process shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision Permit No. F 097-11766-00107.